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DELIVERED VIA ECF FILING

March 1, 2024

The Honorable Katherine Polk Failla
 United States District Court
 Southern District of New York
 40 Foley Square, Room 2103
 New York, NY 10007
 Tel: (212) 805-0290
 Email: Failla_NYSDChambers@nysd.uscourts.gov

MEMO ENDORSED

Re: *Bush Baby Zamagate, Inc. v. Chapter 4 Corp., d/b/a Supreme, et. al.*
Case Number: 1:23-cv-08946-KPF

Your Honor:

Our firm represents Kejuan Muchita Inc., a co-defendant in the above-captioned matter. We respectfully submit this letter, with consent of all counsel for Plaintiff Bush Baby Zamagate, Inc. (“Plaintiff”) and Defendants Chapter 4 Corp., d/b/a Supreme, Kejuan Muchita Inc., and The Executors of the Albert Jackson Johnson Estate (collectively, “Defendants”) in this matter respectfully requesting an additional two (2) week continuance so that the parties may continue to finalize resolution and settlement of this dispute. The parties are pleased to continue to inform the Court that the parties are in the final stages of finalizing resolution of this matter and the formal settlement agreement.

The Court previously granted the parties a continuance of the Extension of Time to File Defendants’ Answer pursuant to Your Honor’s Order dated December 18, 2023 (ECF No. 21) and on February 20, 2024 (ECF No. 28), as well as a continuance of the Initial Pretrial Conference pursuant to Fed. R. Civ. P. 16 (the “Rule 16 Conference”) on December 21, 2023 pursuant to Your Honor’s Order dated October 30, 2023 (ECF No. 16). The Court granted the parties a further continuance of Defendants’ Time to File an Answer, from February 19, 2024 to March 4, 2024 pursuant to Your Honor’s February 20, 2024 Order (ECF No. 28).

The requested additional two (2) week continuance would extend Defendants' Time to File an Answer in this matter from March 4, 2024 to March 18, 2024 and adjourn the Initial Pretrial Conference accordingly (i.e., the Initial Pretrial Conference was adjourned sine die by the Court on October 30, 2023).

Thank you, in advance, for your consideration regarding this subsequent request and the parties expect and agree that no further continuance should be required and that this matter will be settled and resolved within the next two (2) weeks. The parties will inform the Court of any further developments with respect to settlement and resolution of this matter.

Respectfully Submitted,

/AJS/

Albert J. Soler
Attorneys for Defendant Kejuan Muchita Inc.

cc: All Counsel of Record (via ECF)

Application GRANTED. Rather than grant additional piecemeal extensions of the answer deadline, the Court will provide Defendants with a 30-day extension, which should be more than sufficient for the parties to finalize their settlement in this matter. Accordingly, Defendants shall answer, move, or otherwise respond to the Complaint on or before **April 3, 2024**. The Court will grant no further extensions of this deadline, absent exigent circumstances.

The Clerk of Court is directed to terminate the pending motion at docket entry 29.

Dated: March 4, 2024
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE